

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MELISSA KAYE,

PLAINTIFF,

-against-

NEW YORK CITY HEALTH AND HOSPITALS CORPORATION;  
ELIZABETH FORD;  
ABHISHEK JAIN;  
JONATHAN WANGEL; and  
PATRICIA YANG (as aiders and abettors)

DEFENDANTS.

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**MEMORANDUM OF LAW IN OPPOSITION OF DEFENDANTS’  
MOTION FOR SUMMARY JUDGMENT  
(Request for Oral Argument)**

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***Duly Submitted by:***

Special Hagan, Esq.  
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